

Alex B. Hernandez
Federal Defenders of Eastern Washington & Idaho
306 E. Chestnut Ave.
Yakima, WA 98901
(509) 248-8920

Attorney for Defendant
Jose Bautista Andrade

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON
The Honorable Stanley A. Bastian

United States of America,

Plaintiff,

v.

Jose Bautista Andrade,

Defendant.

No. 1:24-CR-2064-SAB

**Declaration of Counsel in
Support of Sentencing
Memorandum**

Pursuant to 28 U.S.C. § 1746, I, Alex B. Hernandez, III, declare, under penalty of perjury, that the following is true and correct:

1. I am an attorney employed by the Federal Defenders of Eastern Washington and Idaho and represent Jose Bautista Andrade.

Declaration of Alex B.
Hernandez - 1

1
2 2. In support of Defendant's sentencing memorandum, I am attaching to this
3 declaration the following Exhibits:

4 Exhibit A – Letters of Support

5 A:1 – Mother of Jose's daughter
6 A:2 – Ana Karen Mena Martinez
7 A:3 – Sandra
8 A:4 – D.
9 A:5 – S. N.

10 Exhibit B – Certificates

11 Exhibit C – Family Photos

12 Dated June 12, 2025, in Yakima County, Washington.

13 Respectfully submitted,

14 s/Alex B. Hernandez
15 Alex B. Hernandez, 21807
16 Attorney for Jose Bautista Andrade
17 Federal Defenders of Eastern
18 Washington and Idaho
19 306 East Chestnut Avenue
20 Yakima, Washington 98901
21 (509) 248-8920
22 (509) 248-9118 fax
23 Ben_Hernandez@fd.org
24
25

Declaration of Alex B.
Hernandez - 2

CERTIFICATE OF SERVICE

I certify that on June 12, 2025, I electronically filed the Declaration of Alex B. Hernandez, with the Clerk of the Court using the CM/ECF System which will send notification of such filing to: Benjamin D. Seal, Assistant United States Attorney and Shane Moore, U.S. Probation Officer.

s/Alex B. Hernandez
Alex B. Hernandez, 21807
Attorney for Jose Bautista Andrade

EXHIBIT A

LETTERS OF SUPPORT FROM FAMILY

- A: 1 – Mother of Jose’s daughter
- A: 2 – Ana Karen Mena Martinez
- A: 3 – Sandra
- A: 4 – D.
- A: 5 – S. N.

I, Lourdes F. Gutierrez, Interpreter with the Federal Defenders of Eastern Washington & Idaho, certify that I have translated the following letters from Spanish to English to the best of my ability. The letters are regarding Jose Bautista Andrade.



Lourdes F. Gutierrez

Para Señor Juez

18-05-2025

Hola Buenas tardes Señor Juez me presento soy mamá de la hija de Jose Bautista. Jose es una Buena persona estuvimos Juntos 8 años Siempre fue responsable, honesto y un padre muy presente ya que siempre estaba pendiente de su hija Tanto como para la escuela tanto como para cuando ella se enfermara, ahora que el no esta si pesa su ausencia tanto para mi tanto más para su hija porque todas las noches pregunta por el en la escuela tambien se noto por que bajo mucho sus notas y aun que tratamos de darle ánimos no es lo mismo pues ella requiere a su padre presente pues estaba acostumbrada a eso; Tambien se extraña su presencia en casa pues aun que no vivieramos Juntos a el 100% el estaba allí para cualquier cosa que yo ocupara y ahora que no es asi eso pesa y me hace mucha falta y el no es malo es una persona con un gran corazón y un padre estupendo y lo extrañamos todos los dia

Por su atencion Gracias Señor Juez

05/18/2025

Judge:

Good afternoon, Your Honor. I am the mother of Jose Bautista's daughter.

Jose is a good person. We were together for eight years and he was always responsible, honest and a very patient father. He always watched out for her, both in her education and when she would get sick. His absence is really heavy now that he is not here for both me and more so for his daughter. She asks after him every night and her grades in school have fallen. Even though we have tried to encourage her, it is not the same for her because she needs her father with her since she was so used to that. We also miss his presence at home. Even though we did not live together 100% of the time, he was there whenever I needed him. Now that he's not there it hurts, and I need him very much. He is not a bad person; he has a great heart and is a wonderful father. We miss him every day.

Thank you for your time, Your Honor.

Tijuana Baja California,
28 de Marzo de 2025

Para el Juez:

Escribo esta carta para decir textualmente el tipo de persona que es Jose. Es una persona cariñosa con su familia, en especial con su hija, la cual es la persona que más ama en su vida, algo que más recuerdo de el, es que siempre estaba dispuesto a ayudar tanto como a conocidos como a desconocidos. Siempre estuvo cuando su hija lo necesitaba, y gracias a el cada navidad su hija tenía y podía abrir tantos regalos como ella quisiera, y en cada cumpleaños, aunque el no pudiera estar, siempre le dijo cuanto la amaba y dio todo, hasta su libertad, para que a ella y a su esposa nunca le faltara nada. Y cuando estaba con nosotros todos recordamos sus comidas, en especial yo, convivi con el y puedo decir lo especial que el es para nosotros, y esperare hasta que el regrese para poder abrazarlo y agradecerle todo lo que hizo por mi sobrina y mi hermana.

De parte de: Ana Karen Mena Martinez

Tijuana, Baja California

March 28, 2025

Judge:

I write this letter to tell you the type of person Jose is. He is a loving person towards his family, especially his daughter, who is the person he loves most in this life. Something I remember the most about him is that he is always willing to help both people he knows as well as strangers. He was always there for his daughter when she needed him and thanks to him, his daughter was able to open as many gifts as she wanted for Christmas and her birthdays even if he couldn't be there in person. He would always tell her how much he loved her and would give her everything, even her freedom, so his wife and her would never go without. We all remember his meals when he was with us, especially myself, and I can say that it was very special for us. I will await his return so I can hug and thank him for all that he did for my sister and niece.

From: Ana Karen Mena Martinez

Buenos Días Señor Juez
Soy Sandra Soy Sobrina y Comadre
Del Señor Jose Bautista
Extraño los desayunos que el nos
Preparaba los fines de semana
familiares que pasabamos en su
Casa y las salidas en familia
y cuando se ponía a jugar con
mis hijos y sobrinos los consejos
que nos daba y las pláticas
largas que teniamos
Extraño llegar a su casa y verlo
Cocinando y bromiando con mi tia
esposa de Jose es pero que
pronto todo vuelva hacer como
en esos momentos de convivencia
y este pronto en su casa con
mi tia y su hija que lo
extrañan mucho
muchas gracias por su comprensión
y ante mano Pase bonito día

Good morning, Your Honor.

I'm Sandra, Mr. José Bautista's niece and comadre. I miss the breakfasts he prepared for us, the weekends we spent at his house, and the family outings. I also miss the time he used to play with my children and nephews. The advice he gave us, and the conversations we had. I miss coming home and seeing him cooking and joking with my aunt, José's wife. I hope everything can be like in those moments of coexistence and that soon he can be at home with my aunt and his daughter, who misses him very much. Thank you very much for your understanding, and I hope you have a nice day.

Hola Señor Juez, Soy Sobrino de Jose
Bautista, es alguien muy especial para mi
Porque en los convivios familiares en su casa
el siempre jugaba conmigo y mis primos,
extraño esos momentos, el me enseño a jugar
futbol, loteria varios juegos de mesa y
tambien extraño acampar en la Playa
Espero entienda como conviviamos con mi
tío y Cuanta falta me hace y tambien
quisiera que entienda Cuanto quiero que
mi tío este aqui conmigo

Saludos, Mi nombre es D. [REDACTED] y tengo 14
años de edad

Hello, Your Honor, I am Jose Bautista's nephew. He is very special to me because he always played with me and my cousins at family gatherings at his house. I miss those moments. He taught me how to play soccer, bingo, and various board games. I also miss camping on the beach. I hope you can understand how my uncle and I used to spend time together and how much I miss him. I also wish you could understand how much I want my uncle to be here with me.

Greetings.

My name is D , and I am 14 years old.

Buenas tardes Señor Juez

mi nombre es Susana Nava tengo 13 años
mi relación con Jose Bautista
es mi Padrino de Bautizo extraño
los momentos familiares con Padrino
y los momentos que me llevaba a la
playa y a las albercas y a campar
me gustaría que estuviera en mis 15 años
Porque el representa algo muy especial
Para mí, espero comprenda lo que significa
que el estuviera aquí con nosotros.

Muchas Gracias por su atención.

Att: S. [redacted] N. [redacted]
"ahijada"

Good afternoon, Your Honor.

My name is Susana Nava. I am 13 years old. Jose Bautista is my godfather. I miss the family time with my godfather and the times he used to take me to the beach, the pools, and camping. I wish he could be here for my 15th birthday because he represents someone very special to me. I hope you understand what it means to have him here with us.

Thank you very much for your attention.

Sincerely, S N "goddaughter"

EXHIBIT B

CERTIFICATES



CERTIFICATE OF COMPLETION

PRESENTED TO

JOSE BAUTISTA ANDRADE

FOR SUCCESSFUL COMPLETION OF

En la sala de un juzgado

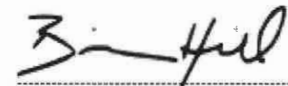
[In the Courtroom]

SCORE: Passed

All course requirements were successfully met in order to earn a "Passed" Certificate of Completion.

March 17, 2024

Date


President of Edovo

This certificate is not equivalent to course credit, milestone, earned time credit, certification, or a degree. We also do not verify the identity of the Learner.

CERTIFICATE OF COMPLETION

PRESENTED TO

JOSE BAUTISTA ANDRADE

FOR PARTICIPATING IN

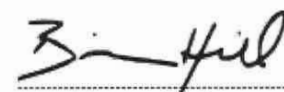
Lleva una GRAN CONVERSACIÓN: Las Personas & La Familia
[Having a GREAT COMMUNICATION: People & Family]

SCORE: Needs Improvement

One or more course requirements need improvement in order to earn a "Passed" Certificate of Completion.

March 17, 2024

Date


President of Edovo

This certificate is not equivalent to course credit, milestone, earned time credit, certification, or a degree. We also do not verify the identity of the Lear

CERTIFICATE OF COMPLETION

PRESENTED TO

JOSE BAUTISTA ANDRADE

FOR PARTICIPATING IN

Exploración de Carrera: Fabricacion

[Career Exploration: Manufacturing]

SCORE: Needs Improvement

One or more course requirements need improvement in order to earn a "Passed" Certificate of Completion.

July 01, 2024

Date



President of Edovo

This certificate is not equivalent to course credit, milestone, earned time credit, certification, or a degree. We also do not verify the identity of the Learner.

CERTIFICATE OF COMPLETION

PRESENTED TO

JOSE BAUTISTA ANDRADE

FOR PARTICIPATING IN

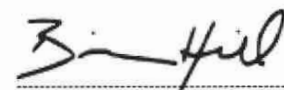
Career Exploration: Manufacturing

SCORE: Needs Improvement

One or more course requirements need improvement in order to earn a "Passed" Certificate of Completion.

July 01, 2024

Date



President of Edovo

This certificate is not equivalent to course credit, milestone, earned time credit, certification, or a degree. We also do not verify the identity of the Learner.

CERTIFICATE OF COMPLETION

PRESENTED TO

JOSE BAUTISTA ANDRADE

FOR PARTICIPATING IN

El proceso de acción penal: Lo básico

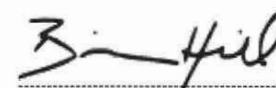
[Criminal Prosecution Process: Basic]

SCORE: Needs Improvement

One or more course requirements need improvement in order to earn a "Passed" Certificate of Completion.

March 17, 2024

Date



President of Edovo

This certificate is not equivalent to course credit, milestone, earned time credit, certification, or a degree. We also do not verify the identity of the Lear

CERTIFICATE OF COMPLETION

PRESENTED TO

JOSE BAUTISTA ANDRADE

FOR PARTICIPATING IN

Ten Commandments - Introduction and the First Tablet - Part I, Lesson One

SCORE: Needs Improvement

One or more course requirements need improvement in order to earn a "Passed" Certificate of Completion.

June 22, 2024

Date



President of Edovo

This certificate is not equivalent to course credit, milestone, earned time credit, certification, or a degree. We also do not verify the identity of the Learner.

CERTIFICATE OF COMPLETION

PRESENTED TO

JOSE BAUTISTA ANDRADE

FOR PARTICIPATING IN

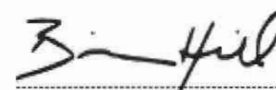
Math - Addition, Subtraction, Multiplication, and Division

SCORE: Needs Improvement

One or more course requirements need improvement in order to earn a "Passed" Certificate of Completion.

June 17, 2024

Date


President of Edovo

This certificate is not equivalent to course credit, milestone, earned time credit, certification, or a degree. We also do not verify the identity of the Learner.

CERTIFICATE OF COMPLETION

PRESENTED TO

JOSE BAUTISTA ANDRADE

FOR PARTICIPATING IN

Aprendiendo Como Ser un Mejor Padre

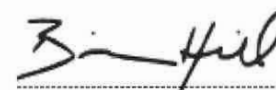
[Learning How To Be a Better Parent]

SCORE: Needs Improvement

One or more course requirements need improvement in order to earn a "Passed" Certificate of Completion.

March 17, 2024

Date



President of Edovo

This certificate is not equivalent to course credit, milestone, earned time credit, certification, or a degree. We also do not verify the identity of the Learner.

CERTIFICATE OF COMPLETION

PRESENTED TO

JOSE BAUTISTA ANDRADE

FOR PARTICIPATING IN

L-3: Introducción al Catecismo de la iglesia católica

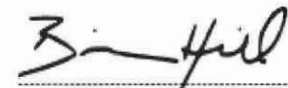
[L-3: Introduction to the Catechism of the Catholic Church]

SCORE: Needs Improvement

One or more course requirements need improvement in order to earn a "Passed" Certificate of Completion.

June 22, 2024

Date



President of Edovo

This certificate is not equivalent to course credit, milestone, earned time credit, certification, or a degree. We also do not verify the identity of the Learner.

EXHIBIT C

PHOTOS

